

# EXHIBIT 2

## DOUGLAS FORREST, ESQ

VICE PRESIDENT –EDISCOVERY STRATEGY & MANAGEMENT

INTERNATIONAL LITIGATION SERVICES

## PROFESSIONAL EXPERIENCE

INTERNATIONAL LITIGATION SERVICES JULY 2010 – PRESENT

*VICE PRESIDENT –EDISCOVERY STRATEGY & MANAGEMENT*

Advising law firms in ESI discovery matters, including production protocols and formats, application of predictive coding, pre-trial conferences, post-production issue analysis.

OZMOSYS, INC

MAY, 2010 - JUNE, 2011, 2000 – 2006

*CHIEF TECHNOLOGY OFFICER*

Designed and developed on-line client-administered service, OEM'ed by Lexis as *LexisNexis Research® Total Alerts*, to deliver individualized e-mails consolidating new content from web sites, Lexis Trackers, Factiva folders, CourtLink, direct publisher feeds, RSS feeds, etc..

Developed Web 2.0 on-line practice area/client daily newsletter service OEM'ed by LexisNexis as *LexisNexis Clipper*.

Developed the on-line technology behind the *LexisNexis Legal Industry Monitor*, *Thompson Elite Daily Docket* and Institutional Investors' *Mutual Fund Daily*, *Hedge Fund Daily* and *Compliance Daily*

ENCORE DISCOVERY SOLUTIONS

AUGUST 2009 – MAY 2010

*DIRECTOR, NORTHEAST REGION*

E-Discovery sales.

GUIDANCE SOFTWARE, INC

MAY 2006 – AUGUST 2009

*E-DISCOVERY SPECIALIST (JANUARY 2009 – AUGUST 2009)*

Oversaw implementation of enterprise ESI software at Verizon, GE, AOL, Bell Canada, etc.

*E-DISCOVERY SERVICES MANAGER (AUGUST 2007 – DECEMBER 2008)*

*E-DISCOVERY BUSINESS MANAGER (MAY 2006 - AUGUST 2007)*

Managed e-discovery professional services sales team.

INDEPENDENT CONSULTANT

1984 – 1989, 1998 - 2006

- Created PDA Application prototype to monitor Point-Of-Purchase materials usage in 1,700 store national retail chain.
- Created workflow-enabled Operations Control system to capture, track and review all hours, services, rentals and expenses, and create invoices in accounting system for major litigation and trial services vendor.
- Designed ESI processing system for major litigation support vendor.
- Developed zero-footprint, insert-and-run CD application for debtor's' data distributions in a \$10 billion+ bankruptcy.

SPECIAL COUNSEL/LIT, INC.

1993 – 1998

*EXECUTIVE DIRECTOR, TECHNICAL SERVICES DIVISION:* Acted as primary technological strategist in developing Xerox/Special Counsel Alliance initiative to legal community.

*VICE PRESIDENT, RESEARCH & DEVELOPMENT:* Conceived, designed and created *WIDE* (Workflow Document Imaging Environment) for Skadden, Arps, Slate, Meagher & Flom to image, index, distribute and manage daily receipt of 15,000 pages of docket materials in 100,000 cases cluster.

Conceived, designed and oversaw development of *LIT CaseWorks*, a *Lotus Notes*-based enterprise-class integrated case management and litigation support system used at Cravath, Swaine & Moore; Simpson Thacher & Bartlett and Dickinson Wright.

*DIRECTOR OF LITIGATION SERVICES:* Litigation support sales and project and account management for clients including Paul, Weiss, Cravath, Simpson Thacher, Chadbourne & Parke, Akin Gump, etc.

MICROEDGE, INC.

1989 – 1993

*VICE PRESIDENT PROFESSIONAL SERVICES*

Built consulting and training divisions for PC software company, including business development, project management and systems analysis. Led development of award-winning system to handle \$34 billion Mexican debt refinancing for Citibank.

CRAVATH, SWAINE & MOORE

1979 – 1984

*SENIOR LITIGATION ASSOCIATE:* Significant involvement in complex litigation, including antitrust analysis for HBO and Time, Inc., IBM antitrust litigation, Iranian hostage defense preparation, international arbitration proceedings and pro bono representation of Phoenix House.

BREED, ABBOTT & MORGAN

1976-1979

*LITIGATION ASSOCIATE:* Work on matters for Honeywell, Armco Steel, National Distillers, Arthur Andersen, etc, with significant attention to antitrust, including monopsony claims.

## EDUCATION

Stanford Law School (J.D., 1976, Note Editor, *Stanford Law Review*)  
Antioch College (B.A., 1973)

I, Douglas Forrest, hereby declare as follows:

1. I am the Vice President, eDiscovery Analytics & Management at International Litigation Services (“ILS”), which is located in Aliso Viejo, California (www.ilsteam.com). I have been retained as a consultant for the Plaintiffs in this action. The facts stated in this declaration, except as otherwise explicitly noted, are within my own personal knowledge and, if called as a witness to testify, I could and would competently testify to the facts contained in this declaration.
2. I was admitted to practice law in New York in 1977, and am still a member in good standing of the New York bar. I have been involved with legal technology for over thirty (30) years, with particular expertise in e-discovery, having participated in, designed and managed numerous discovery and e-discovery projects. My CV is attached as Exhibit A.
3. At ILS, I direct discovery analytics and have directly participated in the management and execution of eDiscovery projects including the application of predictive coding and other advanced analytic techniques to discovery materials and advising in the drafting of predictive coding protocols.
4. I submit this Declaration in support of Plaintiffs’ Motion to Compel Production of Predictive Coding Documents.
5. On or about March 15, 2013, ILS downloaded a DAT file overlay containing a “Relevance\_Score\_Feedback” field from an FTP site of Defendants’ vendor Epiq. The file contained 492,653 predictive coding scores for previously produced documents from the following custodians:

Prefix	Custodian	Original Custodian
TAK-HARRIT	Thomas Harris	y
LLY-SHARE	Lilly	
TAK-BAROND	David Baron	y
TAK-BHATTM	Mondira Bhattacharya	
TAK-CAGGIAC	Christopher Caggiano	y
TAK-CARACM	Mike Caracci	y
TAK-COHENS	Samuel Cohen	
TAK-DALYRI	Rich Daly	y
TAK-FLETCE	Elizabeth Fletcher	

TAK-FUSCOG	Gregory Fusco	y
TAK-GERRIC	Charles Gerrits	y
TAK-GREEBJ	Jennifer Greeby	y
TAK-HASKIJ	Janet Haskins	
TAK-INDNDA	INDNDA	
TAK-JOHNSJ	Janet Johnston	y
TAK-KUPFES	Stuart Kupfer	y
TAK-LEEJES	Jessie Lee	y
TAK-LORENJ	Janet Lorenze	y
TAK-ORLAND	Dan Orlando	y
TAK-ORTELU	Una Ortell	y
TAK-PAGEJG	J.G. Page	
TAK-PARISM	Maria Paris	y
TAK-PERALM	Michelle Peralta	
TAK-PEREZA	Alfonzo Perez	y
TAK-PHARMACO	Pharmacovigilance	
TAK-PRITZM	Mary Jo Pritza	y
TAK-PROMO-AD	Promotion and Advertising Dept	
TAK-RAMSTM	Mary Ramstack	y
TAK-RECKED	David Recker	y
TAK-ROEBEM	Mick Roebel	y
TAK-SPANHR	Robert Spanheimer	y
TAK-TAKEDA	Takeda	
TAK-THOMCL	Claire Thom	y
TAK-TROCHA	Anton Trochanov	y
TAK-WEISBS	Shay Weisbrich	y
TAK-XUESON	Songlin Xue	

6. On March 21, 2013, ILS downloaded production volume TAK-SAMPLE0003, which contained a predictive coding sampling production of 400 documents with Relevance Score Feedback scores of 20, 50, 75 and 90, and now has a total of 493,053 such scores.

7. 345,021 of those 493,053 produced documents for which Relevance Score Feedback scores have been received have scores of 50 or higher. 332,600 have scores of 52 or higher. 65,392 have scores of 95 or higher.

8. On or about May 15, 2013, ILS downloaded production volume TAK361 from Epiq's FTP site. TAK361 contained 4,543 documents, but did not include Relevance\_Score Feedback

scores for them. The breakdown by custodian of these documents, as given in an May 15, 2013 email from Joseph Coleman to Paul Pennock et al. was as follows:

Custodian	Production Volume	Production Begin Bates	Production End Bates	Document Count	Page Count
Alfonzo Perez	TAK361	TAK-PEREZA-00163646	TAK-PEREZA-00165168	136	1523
Andy Hull	TAK361	TAK-HULLAN-00112847	TAK-HULLAN-00112857	10	11
Anton Trochanov	TAK361	TAK-TROCHA-00391280	TAK-TROCHA-00392425	226	1146
Charles Gerrits	TAK361	TAK-GERRIC-00003164	TAK-GERRIC-00003241	47	78
Christopher Caggiano	TAK361	TAK-CAGGIAC-00359947	TAK-CAGGIAC-00360517	534	571
Claire Thom	TAK361	TAK-THOMCL-00035598	TAK-THOMCL-00035635	16	38
Dan Orlando	TAK361	TAK-ORLAND-00084316	TAK-ORLAND-00084316	1	1
D'Arcy Ryan	TAK361	TAK-RYANDA-00141513	TAK-RYANDA-00141513	1	1
David Baron	TAK361	TAK-BAROND-00380067	TAK-BAROND-00380375	178	309
David Recker	TAK361	TAK-RECKED-00155745	TAK-RECKED-00155801	26	57
Gregory Fusco	TAK361	TAK-FUSCOG-00063607	TAK-FUSCOG-00064902	274	1296
INDNDA	TAK361	TAK-INDNDA-02031637	TAK-INDNDA-02036137	631	4501
Janet Johnston	TAK361	TAK-JOHNJSJ-00170784	TAK-JOHNJSJ-00172246	206	1463
Janet Lorenz	TAK361	TAK-LORENJ-00064312	TAK-LORENJ-00064341	18	30
Jennifer Greeby	TAK361	TAK-GREEBJ-01417436	TAK-GREEBJ-01419223	78	1788
Jessie Lee	TAK361	TAK-LEEJES-00165305	TAK-LEEJES-00165780	328	476
Julie Tynan	TAK361	TAK-TYNANJ-00320827	TAK-TYNANJ-00321704	522	878
Karen Alsene	TAK361	TAK-ALSENK-00000001	TAK-ALSENK-00000019	3	19
Maria Paris	TAK361	TAK-PARISM-00096409	TAK-PARISM-00096631	51	223
Mary Jo Pritza	TAK361	TAK-PRITZM-00324810	TAK-PRITZM-00325252	315	443
Mary Ramstack	TAK361	TAK-RAMSTM-00565219	TAK-RAMSTM-00566038	561	820
Maryann Cuomo	TAK361	TAK-CUOMOM-00083904	TAK-CUOMOM-00083935	6	32
Mehmood Khan	TAK361	TAK-KHANME-00023209	TAK-KHANME-00023212	3	4
Mick Roebel	TAK361	TAK-ROEBEM-00120466	TAK-ROEBEM-	129	225

Mick Roebel	TAK361	TAK-ROEBEM-00120466	TAK-ROEBEM-00120690	129	225
Mike Caracci	TAK361	TAK-CARACM-00076631	TAK-CARACM-00076651	18	21
Rich Daly	TAK361	TAK-DALYRI-00280323	TAK-DALYRI-00280364	8	42
Robert Spanheimer	TAK361	TAK-SPANHR-00414963	TAK-SPANHR-00415082	95	120
Shay Weisbrich	TAK361	TAK-WEISBS-00071555	TAK-WEISBS-00071555	1	1
Stuart Kupfer	TAK361	TAK-KUPFES-01338928	TAK-KUPFES-01339151	111	224
Thomas Harris	TAK361	TAK-HARRIT-00083923	TAK-HARRIT-00083933	7	11
Una Ortell	TAK361	TAK-ORTELU-00083798	TAK-ORTELU-00083801	3	4

Executed June 17, 2012.

  
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Douglas Forrest